

P O R T E R | S C O T T

A PROFESSIONAL CORPORATION

John R. Whitefleet, SBN 213301

350 University Ave., Suite 200

Sacramento, California 95825

TEL: 916.929.1481

FAX: 916.927.3706

Attorney for Defendants

CITY OF RANCHO CORDOVA,

NATHAN DANIEL, JOSEPH ZALEC,

AND DEREK HUTCHINS

Van Longyear, SBN 84189

Nicole M. Cahill, SBN 287165

LONGYEAR & LAVRA, LLP

3620 American River Dr., Suite 230

Sacramento, CA 95864

Tel: 916-974-8500

Fax: 916-974-8510

Attorneys for Defendant

COUNTY OF SACRAMENTO

Lawrance A. Bohm, SBN 208716

Scott C. Zienty, SBN 324661

BOHM LAW GROUP, INC.

4600 Northgate Boulevard, Suite 210

Sacramento, CA 95834

TEL: 866.920.1292

FAX: 916.927.2046

Attorneys for Plaintiffs

THOMAS WILLIAMS,

CARLOS WILLIAMS

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

THOMAS WILLIAMS,

Plaintiff,

v.

Case No. 2:20-cv-00598-TLN-KJN

Case No. 2:19-cv-02345-TLN-KJN

**JOINT STIPULATION AND ORDER TO
CONTINUE PRE-TRIAL DEADLINES**

COUNTY OF SACRAMENTO; CITY OF
RANCHO CORDOVA; NATHAN
DANIEL; JOSEPH ZALEC; DEREK
HUTCHINS and DOES 1 through 50
inclusive,

Defendants.

CARLOS WILLIAMS

Plaintiff

v.

COUNTY OF SACRAMENTO;
RANCHO CORDOVA POLICE DEPARTMENT;
and DOES 1 through 50 inclusive,

Defendants.

Plaintiffs THOMAS WILLIAMS and CARLOS WILLIAMS (“Plaintiffs”) and Defendants
COUNTY OF SACRAMENTO, CITY OF RANCHO CORDOVA, NATHAN DANIEL, JOSEPH
ZALEC, AND DEREK HUTCHINS, (collectively “Defendants”), by and through their (“Parties”)
counsel of record, hereby stipulate and request that the Court continue discovery and the pre-trial deadlines
in this matter. Good cause exists for the requested continuance pursuant to Federal Rules of Civil
Procedure Rule 16(d) based upon the following:

1. On July 15, 2021, this Court consolidated the above-referenced cases with respect to
discovery only.

2. On October 5, 2021, in Case No. 2:20-cv-00598-TLN-KJN, this Court issued an Amended
Pre-Trial Scheduling Order setting forth all pre-trial deadlines. The Court entered the same Order on
October 26, 2021 in Case No. 2:19-cv-02345-TLN-KJN.

3. The Parties seek an extension of all pre-trial deadlines for the following reasons: (1) several
discovery disputes have recently arisen which may require court intervention, one of which is now pending
before the Court [ECF No. 26]; (2) Defendants have served subpoenas for medical records, some of which
are still outstanding; (3) the Parties intend to conduct additional discovery and at least six (6) additional
depositions in this case and need additional time for scheduling.

4. The Parties, through their respective undersigned counsel, agree and hereby do stipulate to respectfully request that the Court modify the scheduling order as follows:

Event	Schedule	Proposed New Schedule
Fact Discovery	May 12, 2022	January 12, 2023
Expert Witness Disclosure	July 14, 2022	March 14, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Remains unchanged
Dispositive Motions	December 15, 2022	August 15, 2023

Dated: April 6, 2022

BOHM LAW GROUP, INC.

By: /s/ Scott C. Zienty (auth. 3/31/22)
 Lawrence A. Bohm
 Scott C. Zienty
 Attorney for Plaintiffs

Dated: April 6, 2022

LONGYEAR & LAVRA, LLP

By: /s/ Nicole M. Cahill (auth. 3/30/22)
 Van Longyear
 Nicole M. Cahill
 Attorney for Defendant
 COUNTY OF SACRAMENTO

Dated: April 6, 2022

PORTER SCOTT
 A PROFESSIONAL CORPORATION

By: /s/ John R. Whitefleet
 John R. Whitefleet
 Attorney for Defendants
 CITY OF RANCHO CORDOVA,
 NATHAN DANIEL, JOSEPH ZALEC,
 AND DEREK HUTCHINS

ORDER

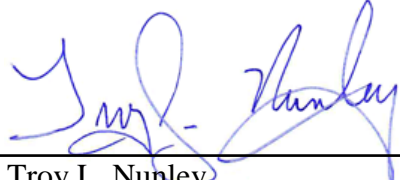
Good cause having been shown, based on the foregoing Stipulation by the Parties, the Court hereby ORDERS as follows:

1. The pre-trial deadlines in this case shall be amended as follows:

Event	Schedule	Proposed New Schedule
Fact Discovery	May 12, 2022	January 12, 2023
Expert Witness Disclosure	July 14, 2022	March 14, 2023
Supplemental Expert Witness Disclosure	Within 20 days after designation of expert witnesses	Remains unchanged
Dispositive Motions	December 15, 2022	August 15, 2023

IT IS SO ORDERED.

Dated: April 6, 2022



Troy L. Nunley
United States District Judge